From:	HarborComments
To:	PortlandHarbor
Subject:	Harbor Comments - ESD
Date:	Monday, December 24, 2018 12:44:42 AM

From: (b) (6)

Sent: Friday, December 21, 2018 10:07 AM

To: HarborComments <HarborComments@epa.gov>

Subject: Harbor Comments - ESD

To whom it may concern,

I have several concerns in regard to EPA's implementation of new toxic levels for benzopyrene (a) also known as BaP, on the Willamette River superfund site.

The concerns are as follows:

• Because the chemical is concentrated in a north Portland hotspot, it should be reduced to the same levels as the upriver background levels of BaP in the urban Willamette River for the sake of equity in safety and river access for north and northwest Portlanders.

• There is not enough information on safety of skin contact in the ESD even though Cathedral and Kelley Point beaches are affected by a PAH hotspot. Those beaches are the only access to the river available for many residents in north and northwest neighborhoods. The lack of information is unacceptable.

• The safety of all human activities such as swimming, boating, recreation, beach contact, wading and fishing, should be considered in interpreting the change throughout the superfund site, not just dock work. The community goal expressed clearly in the response to the Proposed Plan was for a safe, multi-use river. That includes all sites.

• PAH mixtures that can be more toxic than the original pollutant according to studies at Oregon State University (OSU). The ESD has not studied synergy of mixtures of BaP with other PAHs or pollutants outside the family. Since there is no assurance they would be at safe levels, EPA should error on the side of caution and consider toxicity levels higher than the original chemical when doing cleanup. Therefore, the original ROD clean up requirements of PAHs should be implemented.

• Breakdown byproducts of BaP and the other PAHs to be changed can be more toxic than the original chemical according to OSU studies. The ESD has not studied break down byproducts and cannot give assurance that they would be safe. EPA should error on the side of caution and consider toxicity levels higher than the original chemical when doing cleanup. The original ROD clean up requirements of PAHs should be implemented.

• Safety of environmental receptors, such as wildlife, especially endangered species, should be considered when interpreting the change, not just safety of human activities. Leaving BaP and six other PAHs in river sediments where the chain of life begins harms all wildlife indefinitely. It does not meet the community goal of safe river habitat expressed in the response to the Proposed Plan.

• The largest concentration of BaP and other PAHs in river miles 5-7 is also the least likely part of the river to have sediment deposits due to the narrow channel and fast moving current. Natural recovery is therefore unlikely. It is unacceptable to leave BaP and the six other PAHs in river sediments where the chain of life begins to continue to harm all wildlife indefinitely.

• Interpretation of BaP's updated toxic values should help, not hinder the goal of a multi-use river as strongly expressed by the community in the Record of Decision. We expect our beaches, fish, recreational activities to be as safe as the rest of the urban Willamette River for equity and equal access in north and northwest Portland.

• Implementation of a downgrade in toxicity levels of BaP and six other PAHS as part of EPA negotiations with PRPs sets a negative precedent for the Willamette River Superfund and could lead to further such actions in the future. This is unacceptable as part of negotiations and should instead follow the 5-year review timing protocol.

Thank you,

(b) (6) ,

Portland Harbor Community Advisory Group

Portland Harbor Community Coalition

Cathedral Park Neighborhood Association

Friends of Baltimore Woods